

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,	)	
SMARTMATIC	)	
INTERNATIONAL HOLDING B.V. and	)	
SGO CORPORATION LIMITED,	)	
	)	
Plaintiffs,	)	Case No. 22-cv-00098-WMW-JFD
	)	
v.	)	
	)	
MICHAEL J. LINDELL and MY PILLOW,	)	
INC.,	)	
	)	
Defendants.		

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**DECLARATION OF MICHAEL LINDELL'S  
IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT**

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I, Michael J. Lindell, hereby declare the following:

1. My name is Michael Lindell, and I am a Defendant in the above-captioned matter and a majority shareholder for Defendant My Pillow.
2. For many months throughout 2021, when my statements were made at issue in the above-captioned matter, I frequently asked Dr. Douglas Frank to analyze election result data and consulted with him concerning technical issues.
3. I relied on all the experts interviewed in my documentaries who provided me with data, facts, and information from legitimate sources that led me to truly believe the statements I was making were accurate.

4. I have never, and did never, make any statement about Smartmatic that I did not believe was truthful based on the data, facts, and third-party experts I spoke to as well as my own personal research involving deviations in election data such as the cast vote record from L.A. County and numerous voter rolls from different states that I personally paid for.

5. I relied on Dr. Frank for information about voting machines in general during the 2020 election, as well as many others including Colonel Waldren, General McInerny, Dennis Montgomery, General Flynn, cybersecurity expert Jeff O'Donnell, Walter Dougherty, Ph.D., and Russell Ramsland—all of which led to my belief that there was manipulation of the votes in the 2020 election.

6. I relied on Dr. Frank and many other experts, as shown in my documentaries and referenced by me, to provide information and data and public resources that supported my belief that there was election fraud in the 2020 Presidential election.

7. I relied on experts who stated they presented some information of election irregularities and manipulation to state and federal agencies, but those agencies ignored that data, which led to my good faith belief that certain government officials were involved or otherwise had a reason to silence voices expressing concerns about election fraud in 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 27, 2024.

  
Michael Lindell